



March 11, 2005

Mr. Deepak Joshi
Lead Aerospace Engineer (Structures)
National Transportation Safety Board
490 L'Enfant Plaza, SW, Room 5235
Washington, DC 20594

RE: NPRM 427, Federal Register, December 27, 2004, pages 77150-77152
Proposed Revision to 49 CFR, Part 830.2

Dear Mr. Joshi:

I am writing this letter on behalf of our Company in order to state our complete opposition to the proposed revision that will eliminate the ground rotor blade strike exclusion from the "Substantial Damage" definition of 49 CFR 830.2.

Although we appreciate the ongoing efforts of NTSB to enhance aviation safety, we are concerned that this proposed revision dramatically changes the definition of what constitutes a reportable accident for helicopters involved in rotor ground strike incidents that could impose considerable penalties on the helicopter industry including direct costs to manufacturers and pilots as well as operators. Increasing the number of "accidents" on the records of these manufacturers, pilots, and operators will create unnecessary down time and considering the NTSB's limited resources, any benefits to this rule revision becomes questionable in terms of improved safety.

Thank you for the opportunity to comment, and we hope the NTSB will reconsider its decision to eliminate the ground strike exclusion from the substantial damage definition of 49 CFR 830.2

Sincerely,

Richard "Lash" Larew
Executive Vice President
Rainier Heli-Lift, Inc.



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Sincerely,

Steven L. Wright
Vice President
Rainier Heli-Lift, Inc.